

EPIC RESINS

DIVISION OF EPIC CORPORATION

600 INDUSTRIAL BLVD.

Palmyra, WI 53156

(262) 495-3400

FAX (262) 495-3410

A05-0050

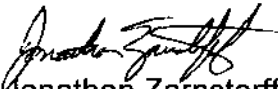
JAN 17 2002

January 15, 2002

To Whom It May Concern:

Enclosed is a revision to our original National Environmental Performance Track application. Mark Messersmith (Region 5 contact) instructed me to revise the enclosed pages and send them off to you. He has also received a fax copy of the revision. If you have any questions I can be contacted at telephone number listed above.

Sincerely,



Jonathon Zarnstorff
Compliance Officer

Why do we need this information?

Facilities need to demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

① Community inquiries and concerns are handled by Jonathon Zarnstorf, a designated member of the management team. Mr. Zarnstorf is responsible for documenting, replying to, and following up on any community concern. This information is then reviewed by management. DV

2 How do you inform community members of important matters that affect them?

② See above. Also, our facility is always open during business hours for members of the community to tour and meet with management if there are concerns. DV

3 How will you make the Performance Track Annual Performance Report available to the public?

☐ Website www.

☐ Newspaper

☐ Open Houses

☐ Other

units of production or output.

(Quantity/Units)

☐ Option B:
In terms of
units of production
or output

(Quantity/Units)

d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

☐ Option A:
Absolute value

(Quantity/Units)

☐ Option B:
In terms of
units of production
or output

(Quantity/Units)

e. How will you achieve this improvement?

Second aspect you've selected

a. What is the aspect?

ACCIDENTAL RELEASES

b. Is this aspect identified as significant in your EMS?

☐ Yes ☒ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value

0
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output

(Quantity/Units)

d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

☒ Option A:
Absolute value


0
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output

(Quantity/Units)

e. How will you achieve this improvement?

WE WILL FURTHER REDUCE THE
POTENTIAL FOR ACCIDENTAL RELEASE.
WE WILL ACHIEVE THIS IMPROVEMENT
THROUGH EQUIPMENT UPGRADES IN
ONE OR MORE OF THE FOLLOWING
AREAS: PACKAGING EQUIPMENT, VENTILATION
SYSTEM, AND CHEMICAL STORAGE

BY UPGRADING PACKAGING 
EQUIPMENT WE WOULD REDUCE POTENTIAL
FOR ACCIDENTAL RELEASE BY FURTHER
REDUCING THE CHANCE OF HUMAN ERROR.

VENTILATION SYSTEM UPGRADES WILL
REDUCE POTENTIAL FOR RELEASE BY
HAVING MORE TECHNOLOGICALLY ADVANCED
EQUIPMENT IN USE (EX. CAPTURE
EFFICIENCY FOR PARTICULATES)

BY UPGRADING STORAGE SYSTEMS (EX. NEW
RACKING) THE POTENTIAL FOR ACCIDENTAL
RELEASE IS REDUCED.



National
Environmental
Achievement Track

U.S. Environmental Protection Agency

A05-0050

OCT 26 2001

Application Form

EPIC RESINS

Name of facility

EPIC CORPORATION

Name of parent company (if any)

600 INDUSTRIAL BLVD.

Street address

Street address (cont.)

PALMYRA, WI 53156

City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name JONATHAN ZARNSTORFF

Title COMPLIANCE OFFICER

Phone (262) 495-3400

Fax (262) 495-3410

E-mail jzarnstorff@epicresins.com

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.



1 What do you do or make at your facility?

EPIC RESINS DESIGNS AND
MANUFACTURES CUSTOM FORMULATED
EPOXY RESIN AND POLYURETHANE
ADHESIVES, POTTING COMPOUNDS, ELECTRICAL
AND INSULATING VARNISHES, COATINGS,
AND LAMINATING SYSTEMS.

2 List the Standard Industrial Classification (SIC) codes or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC

3087

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☒ Yes

No

4 How many employees (full-time equivalents) currently work at your facility?

☒ Fewer than 50

50-99

100-499

500-1,000

More than 1,000

- 5 Does your facility have an EPA ID number(s) ?

☒ Yes

No

If yes, list in the right-hand column.

WI0001013929

- 6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right or enclose a completed Checklist with your application.

- 7 Check the appropriate box in the right-hand column.

I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

- 8 Optional: Is there anything else you would like to tell us about your facility?

FACILITY WAS BUILT WITHOUT
FLOOR DRAINS IN PRODUCTION ROOM
AND WAREHOUSE TO PREVENT ACCIDENTAL
RELEASE. IF SPRINKLER SYSTEM WERE
ACTIVATED, VALVE IN STORM SEWER
AUTOMATICALLY SHUTS, CREATING A
HOLDING POND IN THE LOADING DOCK
TO PREVENT DISCHARGE FROM TRAVELLING

Why do we need this information?

Facilities need to have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy _____ ✓ Yes

b. Planning _____ ✓ Yes

c. Implementation and operation _____ ✓ Yes

d. Checking and corrective action _____ ✓ Yes

e. Management review _____ ✓ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)? ✓ Yes

3 Did this cycle include both an EMS and a compliance audit? ✓ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? ✓ Yes

If yes, what method of EMS assessment did you use?

Self-assessment

GEMI

Other

CEMP

✓ Third-party assessment

✓ ISO 14001 Certification

Other

Why do we need this information?

Facilities need to show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you need to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
WATER USE IN QPC LABORATORY	380	gal/day	1	gal/day
<p>i. How is the current level an improvement over the previous level?</p> <p><u>This is a 97% reduction in water use for a constant temperature bath.</u></p>				
<p>ii. How did you achieve this improvement?</p> <p><u>Purchased a pump to recirculate water in the bath instead of running water from faucet through the bath and then down the drain.</u></p>				

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Solid waste	15.42	lbs/1000 lbs produced	14.47	lbs/1000 lbs produced
<p>i. How is the current level an improvement over the previous level?</p> <p><u>This is a 6% reduction in the amount of waste generated per 1000 lbs of finished product.</u></p>				
<p>ii. How did you achieve this improvement?</p> <p><u>Change in cleaning solvents, Planning to reduce changes in production equipment used, Procedural changes</u></p>				

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you are a small facility, you need to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

a. What is the aspect?

HAZARDOUS WASTE

b. Is this aspect identified as significant in your EMS?

✓ Yes No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

Option A:
Absolute value _____
(Quantity/Units)

✓ Option B:
In terms of units
of production
or output

5 lbs/1000 lbs produce
(Quantity/Units)

d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

Option A:
Absolute value

3.5 lbs/1000 lbs produced
(Quantity/Units)

✓ Option B:
In terms of units
of production
or output

e. How will you achieve this improvement?

INVESTIGATE AND EVALUATE NON-HAZARDOUS
CLEANING SOLVENT ALTERNATIVES, INVESTIGATE
AND EVALUATE NEW CLEANING EQUIPMENT

Second aspect you've selected

a. What is the aspect?

ACCIDENTAL RELEASES

b. Is this aspect identified as significant in your EMS?

Yes ✓ No

Second aspect continues on the next page.

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

✓ Option A:
Absolute value

0
(Quantity/Units)

Option B:
In terms of units
of production
or output

(Quantity/Units)

d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

✓ Option A:
Absolute value

0
(Quantity/Units)

Option B:
In terms of units
of production
or output

e. How will you achieve this improvement?

WE WILL CONTINUE TO EVALUATE
WAYS TO IMPROVE THE PREVENTIVE
MEASURES ALREADY IN PLACE

Third aspect you've selected

a. What is the aspect?

DISCHARGES TO WATER

b. Is this aspect identified as significant in your EMS?

Yes ✓ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

✓ Option A:
Absolute value

0
(Quantity/Units)

Option B:
In terms of units
of production
or output

(Quantity/Units)

d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

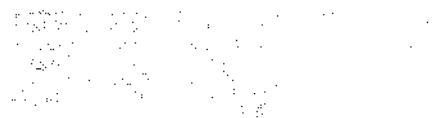
✓ Option A:
Absolute value

0
(Quantity/Units)

Option B:
In terms of units
of production
or output

e. How will you achieve this improvement?

WE WILL CONTINUE TO EVALUATE
WAYS TO IMPROVE THE PREVENTIVE
MEASURES ALREADY IN PLACE



Fourth aspect you've selected

a. What is the aspect?

b. Is this aspect identified as significant in your EMS?

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

e. How will you achieve this improvement?

Yes No

Option A:

Absolute value

(Quantity/Units)

Option B:

In terms of units
of production
or output

(Quantity/Units)

Option A:

Absolute value

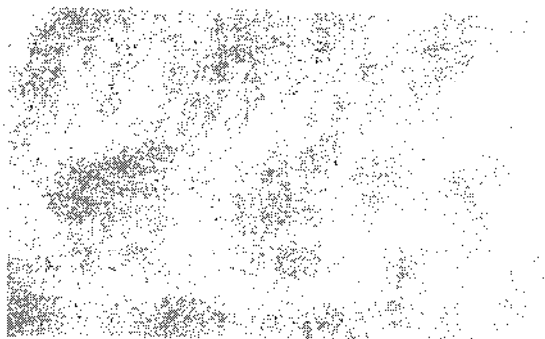
(Quantity/Units)

Option B:

In terms of units
of production
or output

Why do we need this information?

Facilities need to demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.



What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

- 1 How do you identify and respond to community concerns?

PROCEDURE IN PLACE FOR
ENVIRONMENTAL COMMUNICATIONS
WITH PUBLIC.

- 2 How do you inform community members of important matters that affect them?

PROCEDURE IN PLACE FOR
ENVIRONMENTAL COMMUNICATIONS
WITH PUBLIC

- 3 How will you make the Achievement Track Annual Performance Report available to the public?

✓ Website www.epicresins.com

Newspaper

Open Houses

✓ Other

PERFORMANCE REPORT WILL
ALSO BE POSTED IN LOBBY

4 Are there any ongoing citizen suits against your facility?

Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below.

	Organization	Name	Phone number
Representative of a Community/ Citizen Group	Palmyra Police Dept. / Local Emergency Government Coordinator	Chief Neubauer	(262) 495-4200
State/Local regulator	WISCONSIN DEPT. OF NATURAL RESOURCES	JAMES BERTOLAGNI	(608) 275-3266
Other community/local reference	STANDARD PROCESS	FRANCIS C. DU BOIS (President)	(800) 848-5061

On behalf of EPIC RESINS
[my facility].

I certify that

I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;

- I have personally examined and am familiar with the information contained in this Application, (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date



10-24-01

Printed Name/Title

DON VEENHUIS PRESIDENT

Facility Name

EPIC RESINS

Facility Street Address

600 INDUSTRIAL BLVD PALMYRA, WI 53156

Facility ID Numbers

WI 0001023929

We've included the following Checklist to help you answer questions in *Section A, Tell us about your facility*. This Checklist will help you identify the *major* federal, state, tribal, and local environmental requirements that apply at your facility, but it is not an exhaustive list of all environmental requirements that may be applicable at your facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application.

Air Pollution Requirements

Check all that apply.

- ☐ 1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61)
- ☐ 2. Permits and Registration of Air Pollution Sources
- ☐ 3. General Emission Standards, Prohibitions, and Restrictions
- ☐ 4. Control of Incinerators
- ☐ 5. Process Industry Emission Standards
- ☐ 6. Control of Fuel Burning Equipment
- ☐ 7. Control of VOCs
- ☐ 8. Sampling, Testing, and Reporting
- ☐ 9. Visible Emissions Standards
- ☐ 10. Control of Fugitive Dust
- ☐ 11. Toxic Air Pollutants Control
- ☐ 12. Vehicle Emissions Inspections and Testing

Other (you must list these)

- ☐ 13. Other Federal, State, Tribal, or Local Regulations not listed above.

Hazardous Waste Management Regulations

Check all that apply.

- ☒ 1. Identification and listing of hazardous waste (40 CFR 261)
 - ☒ -Characteristic waste
 - ☐ -Listed Waste

- ☒ 2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
- ☒ -Manifesting
 - ☒ -Pre-transport requirements
 - ☒ -Record-keeping/Reporting
- ☐ 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
- ☐ -Transfer facility requirements
 - ☐ -Manifest system and Record-keeping
 - ☐ -Hazardous waste discharges
- ☐ 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
- ☐ -General facility standards
 - ☐ -Preparedness and prevention
 - ☐ -Contingency plan and emergency procedures
 - ☐ -Manifest system, record-keeping, and reporting
 - ☐ -Groundwater protection
 - ☐ -Financial requirements
 - ☐ -Use and management of containers
 - ☐ -Tanks
 - ☐ -Waste piles
 - ☐ -Land treatment
 - ☐ -Incinerators
- ☐ 5. Interim Standards for TSD Owners and Operators (40 CFR 265)
- ☐ 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267)
- ☐ 7. Administered Permit Program (Part B) (40 CFR 270)

Other (you must list these)

- ☒ 8. Other Federal, State, Tribal, or Local Regulations not listed above.

WI SOLID AND HAZARDOUS WASTE REGS.

Hazardous Materials Management

Check all that apply.

- ☐ 1. Control of Pollution by Oil and other Hazardous Substances (33 CFR 153)
- ☒ 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302)
- ☒ 3. Hazardous Materials Transportation Regulations (49 CFR 172-173)
- ☒ 4. Worker Right-to-Know Regulations (29 CFR 1910.1200)
- ☒ 5. Community Right-to-Know Regulations (40 CFR 350-372)

Other (you must list these)

- ☐ 6. Other Federal, State, Tribal, or Local Regulations not listed above.

Solid Waste Management

Check all that apply.

- ☐ 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257)
- ☐ 2. Permit Requirements for Solid Waste Disposal Facilities
- ☐ 3. Installation of Systems of Refuse Disposal
- ☐ 4. Solid Waste Storage and Removal Requirements
- ☐ 5. Disposal Requirements for Special Wastes

Other (you must list these)

- ☐ 6. Other Federal, State, Tribal, or Local Regulations not listed above.

Water Pollution Control Requirements

Check all that apply.

- ☐ 1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)
- ☒ 2. Designation of Hazardous Substances (40 CFR 116)
- ☒ 3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)
- ☐ 4. NPDES Permit Requirements (40 CFR 122)
- ☐ 5. Toxic Pollutant Effluent Standards (40 CFR 129)
- ☐ 6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403)

Name of POTW _____

ID # of POTW _____

- ☐ 7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414)
- ☐ 8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415)
- ☐ 9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416)
- ☐ 10. Water Quality Standards
- ☐ 11. Effluent Limitations for Direct Dischargers
- ☐ 12. Permit Monitoring/Reporting Requirements
- ☐ 13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants
- ☐ 14. Collection, Handling, and Processing of Sewage Sludge
- ☐ 15. Oil Discharge Containment, Control, and Cleanup
- ☐ 16. Standards Applicable to Indirect Discharges (Pretreatment)

Other (you must list these)

- ☐ 17. Other Federal, State, Tribal, or Local Regulations not listed above.

Drinking Water Regulations

Check all that apply.

- ☐ 1. Underground Injection and Control Regulations, Criteria, and Standards (40 CFR 144, 146)
- ☐ 2. National Primary Drinking Water Standards (40 CFR 141)
- ☐ 3. Community Water Systems Monitoring and Reporting Requirements (40 CFR 141)
- ☐ 4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources
- ☐ 5. Underground Injection Control Requirements
- ☐ 6. Monitoring, Reporting, and Record-keeping Requirements for Community Water Systems

Other (you must list these)

- ☐ 7. Other Federal, State, Tribal, or Local Regulations not listed above.

Toxic Substances

Check all that apply.

- ☒ 1. Manufacture and Import of Chemicals, Record-keeping, and Reporting Requirements (40 CFR 704)
- ☐ 2. Import and Export of Chemicals (40 CFR 707)
- ☐ 3. Chemical Substances Inventory Reporting Requirements (40 CFR 710)
- ☐ 4. Chemical Information Rules (40 CFR 712)
- ☐ 5. Health and Safety Data Reporting (40 CFR 716)
- ☐ 6. Pre-manufacture Notifications (40 CFR 720)
- ☐ 7. PCB Distribution Use, Storage, and Disposal (40 CFR 761)
- ☐ 8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762)
- ☐ 9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)

Other (you must list these)

- ☐ 10. Other Federal, State, Tribal, or Local Regulations not listed above.

Pesticide Regulations

Check all that apply.

- ☐ 1. FIFRA Pesticide Use Classification (40 CFR 162)
- ☐ 2. Procedures for Storage and Disposal of Pesticides and Containers (40 CFR 165)
- ☐ 3. Certification of Pesticide Applications (40 CFR 171)
- ☐ 4. Pesticide Licensing Requirements
- ☐ 5. Labeling of Pesticides
- ☐ 6. Pesticide Sales, Permits, Records, Application, and Disposal Requirements
- ☐ 7. Disposal of Pesticide Containers
- ☐ 8. Restricted Use and Prohibited Pesticides

Other (you must list these)

- ☐ 9. Other Federal, State, Tribal, or Local Regulations not listed above.

Environmental Clean-up, Restoration, and Corrective Action

- ☐ 1. Comprehensive Environmental Response, Compensation, and Liability Act (Superfund). Please identify.

- ☐ 2. RCRA Corrective Action

- ☐ 3. Other Federal, State, Tribal, or Local Environmental Clean-up, Restoration, Corrective Action Regulations Not Listed Above.

Facility name:

EPIC RESINS

Facility location:

600 INDUSTRIAL BLVD PALMYRA, WI 53156

Facility ID numbers:

WI 0001013929